

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TILLIE SALTZMAN, Individually and On ) **CIVIL ACTION NO. 07-9901-SHS**  
Behalf of All Others Similarly Situated, )  
Plaintiff, ) **ECF Filed**  
vs. )  
CITIGROUP INC., CHARLES O. PRINCE, )  
ROBERT E. RUBIN, STEPHEN R. VOLK, )  
SALLIE L. KRAWCHECK, GARY L. )  
CRITTENDEN and ROBERT DRUSKIN, )  
Defendants. )

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LENNARD HAMMERSCHLAG, ) **CIVIL ACTION NO. 07-10258-RJS**  
Individually, and On Behalf of All Others )  
Similarly Situated, )  
Plaintiff, )  
vs. )  
CITIGROUP INC., CHARLES PRINCE, )  
SALLIE KRAWCHECK, GARY )  
CRITTENDEN, )  
Defendants. )

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**NOTICE OF MOTION OF THE U.S. PUBLIC FUND GROUP FOR  
APPOINTMENT AS LEAD PLAINTIFF, APPROVAL OF ITS SELECTION OF  
COUNSEL AS LEAD COUNSEL AND CONSOLIDATION OF ALL RELATED  
ACTIONS**

PLEASE TAKE NOTICE that on a date and time as may be set by the Court, before the Honorable Sidney H. Stein, at the United States District Court for the Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 23A, New York, New York 10007, the State Teachers Retirement System of Ohio (“Ohio STRS”), the Division of Investment of the Treasury of the State of New Jersey (“New Jersey”) and the State Universities Retirement System of Illinois (“SURS”) (collectively, the “U.S. Public Fund Group”) will respectfully move this Court, pursuant to § 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for entry of an Order: (i) appointing the U.S. Public Fund Group as Lead Plaintiff for a class (the “Class”) of investors who purchased the publicly traded securities of Citigroup, Inc. (“Citigroup” or “the Company”); (ii) approving its selection of Bernstein Litowitz Berger & Grossmann LLP (“Bernstein Litowitz”), Berger & Montague, P.C. (“Berger & Montague”) and Berman DeValerio Pease Tabacco Burt & Pucillo (“Berman DeValerio”) as Lead Counsel for the Class; and (iii) consolidating all related securities class actions herewith under Rule 42(a) of the Federal Rules of Civil Procedure.

The U.S. Public Fund Group believes that it has the largest financial interest in the relief sought by the Class, and, thus, should be appointed Lead Plaintiff. The appointment of the U.S. Public Fund Group would also advance the primary goal of the PSLRA’s lead plaintiff provisions to encourage institutional investors with large financial stakes in the outcome of the litigation to assume control over securities class actions. In addition, the U.S. Public Fund Group meets the requirements of Rule 23 of the Federal

Rules of Civil Procedure because its claims are typical of other Class members' claims and because it will fairly and adequately represent the interests of the Class.

This Motion is supported by the accompanying Memorandum of Law in support thereof, the Declaration of Gerald H. Silk filed herewith, the pleadings and other files, and such other written or oral argument as may be permitted by the Court.

For the foregoing reasons, the U.S. Public Fund Group respectfully requests that the Court (i) appoint the U.S. Public Fund Group as Lead Plaintiff pursuant to the PSLRA; (ii) approve the U.S. Public Fund Group's selection of Bernstein Litowitz, Berger Montague, and Berman DeValerio as Lead Counsel for the Class; (iii) consolidate all related securities class actions; and (iv) grant such other and further relief as the Court may deem just and proper.

Dated: January 7, 2008

Respectfully submitted,

/s/ Gerald H. Silk  
**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**  
Gerald H. Silk (GS-4565)  
Avi Josefson (AJ-3532)  
Noam Mandel (NM-0203)  
1285 Avenue of the Americas, 38th Floor  
New York, New York 10019  
Telephone: 212-554-1400  
Facsimile: 212-554-1444

**BERGER & MONTAGUE, P.C.**  
Merrill G. Davidoff (MD-4099)  
Lawrence J. Lederer  
Arthur Stock  
1622 Locust Street  
Philadelphia, Pennsylvania 19103  
Telephone: 215-875-3000  
Facsimile: 215-875-4604

**BERMAN DEVALERIO PEASE  
TABACCO BURT & PUCILLO**

Jeffrey C. Block (JB-0387)  
Kathleen M. Donovan-Maher  
Leslie R. Stern  
One Liberty Square  
Boston, Massachusetts 02109  
Telephone: 617-542-8300  
Facsimile: 617-542-1194

*Counsel to the U.S. Public Fund Group and  
Proposed Lead Counsel for the Class*